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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:
ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

**DECLARATION OF ERIC B. EVANS IN
SUPPORT OF ADMINISTRATIVE
MOTION TO SEAL PORTIONS OF
DEFENDANT GOOGLE'S
OPPOSITION TO PLAINTIFFS'
MOTION TO COMPEL GOOGLE
DOCUMENTS AND THE
DECLARATION OF WILLIAM
CAMPBELL IN SUPPORT THEREOF**

I, Eric B. Evans, declare as follows:

1. I am a partner with the law firm of Mayer Brown LLP, counsel for Defendant Google, Inc. ("Google") in the above-captioned matter. I am admitted to practice law before this Court. I submit this declaration in support of Google's Administrative Motion to Seal Portions of Google's Opposition to Plaintiffs' Motion to Compel Google Documents and the Declaration of William Campbell in Support Thereof that is being filed concurrently herewith.

1 As an attorney involved in the defense of this action, unless otherwise stated, I have personal
2 knowledge of the facts stated in this declaration and if called as a witness, I could and would
3 competently testify to them.

4 2. I have read and reviewed the Declaration of Laszlo Bock also filed concurrently
5 herewith, which describes the competitive harm that Google would suffer if information in the
6 Declaration of William Campbell were made public. Specifically, Mr. Bock testified that were
7 this information made public Google's competitors would discover and therefore better
8 understand, the unique and confidential arrangement between Mr. Campbell and Google
9 regarding his role as senior advisor to Google, including how this arrangement was formalized
10 and documented and the details and express terms and conditions of that arrangement (such as
11 the specific manner in which Mr. Campbell has been, and continues to be, compensated for his
12 work as a senior advisor to Google).

13 3. I have also read and reviewed Google’s Opposition to Plaintiffs’ Motion to
14 Compel. The proposed redactions to the Opposition contain or quote information from the
15 Declaration of William Campbell.

16 4. Accordingly, and for the reasons articulated in the Declaration of Lazlo Bock,
17 these excerpts contain highly confidential information, and Google would suffer competitive
18 harm if such excerpts were made public.

19 5. I declare under penalty of perjury under the laws of the United States of America
20 that the foregoing is true and correct. Executed on January 25, 2013 in Palo Alto, California.

s/ Eric B. Evans

Eric B. Evans